

1 JEFFREY S. RUGG, ESQ., Bar No. 10978
jruugg@bhfs.com
2 BENJAMIN K. REITZ, ESQ., Bar No. 13233
breitz@bhfs.com
3 BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
4 Las Vegas, NV 89106-4614
Telephone: 702.382.2101
5 Facsimile: 702.382.8135

Attorneys for Defendants Volkswagen Group of America, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TIMOTHY LEWIS, an individual;

Plaintiff,

V.

VOLKSWAGEN GROUP OF AMERICA,
INC., a corporation; VOLKSWAGEN
AKTIENGESELLSCHAFT, a business
entity, form unknown; AND DOES 1
through 20, inclusive.

Defendants.

Case No.: 2:16-cv-01732-APG-VCF

**STIPULATION AND ~~PROPOSED~~ ORDER
TO EXTEND TIME**

Defendant Volkswagen Group of America, Inc. (“VWGoA” or “Defendant”), by and through its counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, and Plaintiff Timothy Lewis (“Plaintiff”), by and through the undersigned counsel of record, the law firm of Hyde & Swigart, hereby stipulate and agree as follows:

In order to conserve the resources of the parties, their counsel and the judiciary, Defendant shall have thirty (30) days to answer or otherwise respond to Plaintiff's Complaint following entry of this Court's decision on Defendant's Motion to Stay (ECF No. 5).

1 Dated this 8th day of August, 2016.	Dated this 8th day of August, 2016.
2 BROWNSTEIN HYATT FARBER SCHRECK, LLP	HYDE & SWIGART
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5 By: <u>/s/ Jeffrey S. Rugg</u> JEFFREY S. RUGG, ESQ. BENJAMIN K. REITZ, ESQ., 100 North City Parkway, Suite 1600 Las Vegas, NV 89106-4614 Telephone: 702.382.2101 Facsimile: 702.382.8135	By: <u>/s/ Sara Khosroabadi</u> SARA KHOSROABADI, ESQ. 7854 W. Sahara Ave. Las Vegas, NV 89117 Telephone: (619) 223-7770 Facsimile: (619) 297-1022
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9 Attorneys for Defendants Volkswagen Group of America, Inc.	Attorneys for Plaintiff Timothy Lewis
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BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101

13 IT IS HEREBY ORDERED that a status hearing
14 is scheduled for 11:00 a.m., November 7, 2016,
15 in courtroom 3D.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

8-8-2016

DATED: _____

CERTIFICATE OF SERVICE

Pursuant to Fed.R.Civ.P.5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and that the foregoing **STIPULATION AND PROPOSED ORDER TO EXTEND TIME** was served via electronic service on the 8th day of August, 2016 and to the addresses shown below:

SARA KHOSROABADI, ESQ.
sara@westcoastlitigation.com
HYDE & SWIGART
7854 W. Sahara Ave.
Las Vegas, NV 89117
Telephone: (619) 223-7770
Facsimile: (619) 297-1022
Attorneys for Plaintiff Timothy Lewis

/s/ Karen Wiehl
An employee of Brownstein Hyatt Farber Schreck, LLP